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FILED IN THE U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JAN 11 2022

SEAN F. MCAVOY, CLERK  
DEPUTY  
YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,  
10

11 Plaintiff,

12 v.  
13

14 PAUL LAWRENCE SYLVESTER,

15 Defendant.  
16

1:22-CR-2007-MKD

INDICTMENT

Vio: 21 U.S.C. § 841(a)(1), (b)(1)(C)  
Possession with Intent to  
Distribute a Mixture or  
Substance Containing a  
Detectable Amount of MDMA

21 U.S.C. § 853  
Forfeiture Allegations

17 The Grand Jury charges:  
18

19 On or about March 16, 2021, in the Eastern District of Washington, the  
20 Defendant, PAUL LAWRENCE SYLVESTER, did knowingly and intentionally  
21 possess with the intent to distribute a mixture or substance containing a detectable  
22 amount of 3,4-Methylenedioxymethamphetamine hydrochloride, a Schedule I  
23 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).  
24

25 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

26 The allegations contained in this Indictment are hereby realleged and  
27 incorporated by reference for the purpose of alleging forfeitures.  
28

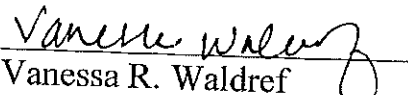
1 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21  
2 U.S.C. § 841 as set forth in this Indictment, the Defendant, PAUL LAWRENCE  
3 SYLVESTER, shall forfeit to the United States of America, any property  
4 constituting, or derived from, any proceeds obtained, directly or indirectly, as the  
5 result of such offense and any property used or intended to be used, in any manner  
6 or part, to commit or to facilitate the commission of the offense.  
7

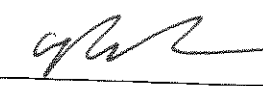
8 If any of the property described herein, as a result of any act or omission of  
9 the Defendant:

- 10 a. cannot be located upon the exercise of due diligence;  
11 b. has been transferred or sold to, or deposited with, a third party;  
12 c. has been placed beyond the jurisdiction of the court;  
13 d. has been substantially diminished in value; or  
14 e. has been commingled with other property which cannot be divided  
without difficulty,

15 the United States of America shall be entitled to forfeiture of substitute property  
16 pursuant to 21 U.S.C. § 853(p).  
17

18 DATED this 11<sup>th</sup> day of January 2022.  
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21

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24   
Vanessa R. Waldref  
25 United States Attorney  
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27   
28 Matthew A. Stone  
Assistant United States Attorney